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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

19 IN RE: CATHODE RAY TUBE (CRT)
20 ANTITRUST LITIGATION

Master File No. 3:07-md-05944-sc (N.D.Cal)

MDL No. 1917

21 This Document Related to:

22 DIRECT PURCHASER ACTIONS
23

DECLARATION OF MATTHEW KIM IN
SUPPORT OF DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT AS TO LG
AND MITSUBISHI SUBSIDIARIES

[Notice of Motion for Summary Judgment,
Declaration of Jessica Barclay-Strobel,
Declaration of Mavis Chou, Declaration of
Richard C. Wingate, and [Proposed] Order filed
concurrently herewith]

24 Judge: Hon. Samuel Conti
25 Date: February 6, 2015
26 Time: 9:00 AM
27 Crtrm.: 1, 17th Floor
28

3:07-MD-05944-SC, MDL1917

DECLARATION OF MATTHEW KIM IN SUPPORT OF
MOT. FOR SUMM. J. AS TO LG AND MITSUBISHI SUBSIDIARIES

Declaration of Matthew Kim

I, Matthew Kim, declare as follows:

1. I am the Senior Human Resources Analyst at LG Electronics U.S.A., Inc., (“LGEUSA”), a position I have held since August, 2014. I have been employed at LGEUSA since October, 2012. All statements in this Declaration are based on my personal knowledge. If I were called upon to testify, I could and would testify to each of the facts set forth herein.

2. I have reviewed the document styled Supplemental Exhibit A, which I am informed was produced by the Direct Action Plaintiffs (“DAPs”) on September 5, 2014. Where there was sufficient information to ascertain the name of the individual who purportedly attended on behalf of an LG-related entity, I cross-referenced that individual’s name with LGEUSA employee records. None of these cross-referenced individuals were LGEUSA employees at the date of the meetings listed on the Supplemental Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 4th day of November, 2014 in Englewood Cliffs, New Jersey.

By: 

Matthew Kim